

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND

STEPHEN M. SHAPIRO ET AL.,

PLAINTIFFS,

v.

DAVID J. MCMANUS, JR., ET AL.,

DEFENDANTS.

CIVIL ACTION

NO. 1:13-cv-03233-JKB

THREE-JUDGE COURT

**UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF *AMICUS CURIAE***

Common Cause, with the consent of the parties, respectfully moves the Court for leave to file the attached Brief of *Amicus Curiae* Common Cause in Support of Plaintiffs' Opposition to the Motion to Dismiss.

Common Cause is a non-partisan democracy organization with over 450,000 members and local organizations in 35 states including Maryland. Since its founding by John Gardner in 1970, Common Cause has been dedicated to campaign finance reform, fair elections and making government more representative, open and responsive to the interests of ordinary people. "For the past twenty-five years, Common Cause has been one of the leading proponents of redistricting reform" (Jonathan Winburn, *The Realities of Redistricting* p. 205 (2008)) and continues to be a vigorous opponent of partisan gerrymandering. Common Cause filed an *amicus curiae* brief in the Supreme Court in

*Shapiro v. McManus*, 577 U.S. \_\_\_, 136 S. Ct. 450 (2015), and also led the coalitions that secured passage of ballot initiatives that created independent redistricting commissions in Arizona and California and passage of the amendment to the Florida Constitution prohibiting partisan gerrymandering. In addition, Common Cause is the sponsor of the annual Gerrymander Standards Writing Competition.

Common Cause offers added perspective on the issues before the Court in this litigation. The proposed brief discusses the First Amendment claim raised by plaintiffs, distinguishes the legal challenge here from prior political gerrymandering cases, and grounds plaintiffs' First Amendment claim in broader First Amendment jurisprudence. The accompanying brief "provide[s] helpful analysis of the law" and "can be useful in resolving the issues presented by the parties." *Bryant v. Better Bus. Bureau of Greater Md., Inc.*, 923 F. Supp. 720, 728 (D. Md. 1996) (citations omitted).

Wherefore, Common Cause respectfully prays that its motion for leave to file the attached *amicus curiae* brief be granted.

Respectfully submitted this 19th day of May, 2016.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 19, 2016, I caused a copy of the foregoing document to be served on all parties by this Court's electronic filing system.

*/s/ Emmet J. Bondurant* \_\_\_\_\_

Emmet J. Bondurant